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 Sanyo Consumer Electronics Co., Ltd.
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UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL) ANTITRUST
 LITIGATION

CASE NOS. 3:11-cv-05781-SI;
 3:11-cv-05765-SI (N.D. Cal.)

MDL NO. 3:07-md-1827-SI

This Document Relates to Individual
 Case Nos. 3:11-cv-05781-SI and 3:11-cv-05765-
 SI (N.D. Cal.)

**STIPULATION AND ~~[PROPOSED]~~
 ORDER REGARDING FURTHER
 DEPOSITIONS**

THE AASI LIQUIDATING TRUST, BY AND
 THROUGH KENNETH A. WELT,
 LIQUIDATING TRUSTEE,

Plaintiff,

vs.

AU OPTRONICS CORPORATION, *et al.*,

Defendants.

TECH DATA CORPORATION; TECH DATA
PRODUCT MANAGEMENT, INC.,
Plaintiffs,
vs.
AU OPTRONICS CORPORATION, et al.,
Defendants

STIPULATION REGARDING FURTHER DEPOSITIONS

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of their respective clients, Plaintiffs The AASI Liquidating Trust, by and through Kenneth A. Welt, Liquidating Trustee and its subsidiaries, Tech Data Corporation, and Tech Data Product Management, Inc. (collectively “Plaintiffs”), on the one hand, and defendants in the above-captioned actions (“Defendants”), on the other hand (each a “Party” and collectively, the “Parties”), as follows:

1. To the extent a witness is listed on a Party’s pretrial witness list and has not been previously deposed in this MDL, that Party shall make the witness available for deposition as soon as is reasonably practicable and at least one month before trial.
2. To the extent any Party submits a declaration, affidavit, or other witness statement in support of or in opposition to a summary judgment motion or other motion in the above-captioned action, and the declarant, affiant, or witness has not yet been deposed in this MDL, that Party shall make that declarant, affiant, or witness available for deposition at least two weeks before any responsive pleading is due, or if there is no responsive pleading, then at least two weeks before a hearing is scheduled on the motion, or if no hearing is scheduled on the motion, then no more than three weeks after the declaration, affidavit, or witness statement is submitted (or at such other time to which the parties may agree).

3. The Parties shall abide by the Special Master's Order re: Deposition Protocol, MDL Dkt. No. 1546 in scheduling depositions and determining appropriate deposition locations.
4. Paragraphs 1 and 2 shall apply only to declarants, affiants, or witnesses currently or formerly employed by a Party.
5. If a declarant, affiant, or witness is neither a current or former employee of the Party, then the Party agrees: (i) to use best efforts to secure the cooperation of the prospective witness; (ii) to provide any known contact information for the prospective witness; (iii) to cooperate on dates and location; and (iv) not to object to a deposition pursuant to a Rule 45 subpoena on the grounds that discovery has closed.

Respectfully submitted,

1 Dated: May 17, 2013

DAVIS WRIGHT TREMAINE LLP

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3 By /s/Sanjay Nangia
4 Allison A. Davis
5 Sanjay Nangia
6 Nick S. Verwolf, *Pro Hac Vice*

7 Attorneys for Defendant
Sanyo Consumer Electronics Co., Ltd.

8 Also filed on behalf of Defendants AU Optronics
9 Corporation; AU Optronics Corporation America; Chi Mei
10 Optoelectronics Corporation (n/k/a Chimei Innolux
11 Corporation), Chi Mei Optoelectronics USA, Inc., CMO
12 Japan Co., Ltd., Chunghwa Picture Tubes, Ltd.; Epson
13 Imaging Devices Corporation; Epson Electronics America,
14 Inc.; HannStar Display Corporation; Hitachi, Ltd.; Hitachi
15 Displays, Ltd. (n/k/a Japan Display Inc.); Hitachi
16 Electronic Devices (USA), Inc.; LG Display Co., Ltd.; LG
17 Display America, Inc.; Mitsui & Co. (U.S.A.), Inc.; Mitsui
18 & Co. (Taiwan), Ltd.; NEC Corporation; NEC Electronics
19 America, Inc.; NEC LCD Technologies, Ltd.; NEC
20 Corporation of America (as to *Tech Data* action only);
21 NEC Display Solutions of America, Inc.; Sharp
22 Corporation; Sharp Electronics Corporation; Toshiba
23 Corporation; Toshiba America Electronic Components,
24 Inc.; Toshiba America Information Systems, Inc.; and
25 Toshiba Mobile Display Co., Ltd.
26
27
28

1 DATED: May 17, 2013

BILZIN SUMBERG BAENA PRICE & AXELROD LLP

2
3 By: /s/ Scott N. Wagner
4 Robert W. Turken
Scott N. Wagner

5 Attorneys for Plaintiffs
6 The AASI Liquidating Trust, by and through Kenneth A.
Welt, Liquidating Trustee; and

7 Tech Data Corporation; Tech Data Product Management
8 Inc.

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18 Attorneys for Plaintiffs
19 Tech Data Corporation; Tech Data Product Management
Inc.

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21 Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this
22 document has been obtained from each of the above signatories.
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IT IS SO ORDERED.

Dated: 05/23/2013



Hon. Susan Illston
United States District Judge